

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

**THE ESTATE OF THE UNBORN CHILD OF
JENNIFER JAWSON; AND JENNIFER
JAWSON,**

Plaintiffs,

v.

**MILWAUKEE COUNTY, et al.,
Defendants.**

Case No: 19-CV-01008-LA

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
THE DEFEDANTS' MOTIONS FOR SUMMARY JUDGMENT AND JOINT MOTION
TO EXCLUDE EXPERTS**

NOW COMES, the Plaintiffs, by and through their attorneys, Judge Lang & Katers, LLC requesting a 40-day extension of time to submit responses to four separate summary judgment motions and a joint motion to exclude experts, states as follows:

1. The previous scheduling order, which the parties stipulated to, required all dispositive motions to be filed on or before January 7, 2022.
2. On the Defendants' motion, the Dispositive motion deadline was moved back to March 30, 2022, for all parties.
3. On March 30, 2022, the Defendants filed four separate motions for summary judgment with supporting briefs and a joint motion to exclude Plaintiffs' experts. (D. 187, 179, 175, 172, 166).
4. Plaintiffs' response briefs are presently due on April 29, 2022.
5. Due to the filings from multiple Defendants and the fact that the dispositive motion deadline was substantially pushed back, counsel for the Plaintiffs believes a 40-day

extension of time is necessary to adequately respond to all four of the summary judgment motions and the motion to exclude Plaintiffs' experts.

6. Plaintiffs' counsel has reached out to all opposing counsel regarding the requested 40-day extension. Opposing counsel for the Defendants have indicated they do not intend on objecting to the Plaintiffs' request for an extension so long as the Defendants are provided with a total of 30 days to submit reply briefs.

7. Plaintiffs' respectfully request an additional 40 days to respond to the Defendants' motions for summary judgment and Joint motion to exclude experts. The Parties additionally agree and submit that the Defendants receive a total of 30 days to file reply briefs. The Plaintiffs shall respond to all Defendants' motions by June 8, 2022, and all Defendants shall submit their reply briefs by July 8, 2022.

Dated at this 7th day of April, 2022.

Respectfully Submitted,
Judge, Lang & Katers, LLC

By: s/ David J. Lang

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